

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION**

UNITED STATES OF AMERICA
ex. rel. Brook Jackson,

Plaintiff,

v.

**VENTAVIA RESEARCH GROUP, LLC;
PFIZER INC.; ICON PLC,**

Defendants.

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Case No. 1:21-cv-00008-MJT

**DEFENDANT ICON PLC’S UNOPPOSED MOTION TO EXTEND TIME TO
ANSWER OR OTHERWISE RESPOND TO PLAINTIFF’S COMPLAINT
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE RULE 6**

TO THE HONORABLE JUDGE OF SAID COURT:

Pursuant to Federal Rule of Civil Procedure Rule 6, Defendant ICON PLC (“ICON”) files this Unopposed Motion to Extend Time to Answer or Otherwise Respond to Plaintiff’s Complaint and would show the Court the following:

1. On January 8, 2022, Relator Brook Jackson’s (“Plaintiff”) Original Complaint was unsealed. Plaintiff filed an Amended Complaint on February 22, 2022 (the “Complaint”).
2. Plaintiff purports to have served ICON with the Summons and Complaint on March 16, 2022, so ICON’s deadline to answer or otherwise respond to Plaintiff’s Complaint was originally April 6, 2022.
3. Plaintiff has agreed to give ICON a brief extension of its deadline to file a responsive pleading up to and including June 6, 2022. Good cause exists to extend the deadline pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure so that ICON can complete its review and investigation of the Complaint.

4. On April 1, 2022, ICON filed its Application for Unopposed Extension of Time to June 6, 2022. ICON could only be granted a thirty (30) day extension through its Application and the full 60-day extension agreed to by counsel for Plaintiff can only be granted by the Court via a formal Motion.

5. The relief requested in this Unopposed Motion is not sought for delay, but so that justice may be done.

6. Counsel for Plaintiff consents to this Motion.

7. Therefore, ICON requests that the Court grant this Unopposed Motion and extend ICON's deadline to answer or otherwise respond to the Complaint until and including June 6, 2022.

8. By filing this Unopposed Motion, ICON does not waive, and specifically preserves, its rights to assert any and all defenses in this matter, including, but not limited to, lack of personal jurisdiction.

Dated this 8th day of April, 2022.

Respectfully submitted,

HUSCH BLACKWELL LLP

/s/ Scott L. Davis

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ATTORNEYS FOR DEFENDANT

ICON PLC

CERTIFICATE OF SERVICE

I hereby certify that on April 8, 2022, a copy of the foregoing document was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to all known counsel of record by operation of the Court's electronic filing system.

/s/ Scott L. Davis

Scott L. Davis